Fill in this information to identify the case:				
Debtor Air	Pros, LLC			
		Nonthonn	Cana	
United States Ba	ankruptcy Court for the:	Northern	_ District of Geor	(State)
Case number	25-10368		_	

#### Modified Official Form 410

# Proof of Claim 12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents**; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

P	Int 1: Identify the Clair	m		
1.	Who is the current creditor?	Equal Employment Opportunity Commission		
		Name of the current creditor (the person or entity to be paid for this claim)		
		Other names the creditor used with the debtor		
2.	Has this claim been acquired from	✓ No		
	someone else?	Yes. From whom?		
3.	Where should notices and	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	
	payments to the creditor be sent?	Equal Employment Opportunity Commission Megan K. OByrne	Charging Party and Aggrieved Individuals TBD	
	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	950 17th St., Ste. 300 Denver, CO 80202, United States	TBD, TBD TBD	
		Contact phone <u>720-779-3608</u>	Contact phone	
		Contact email megan.obyrne@eeoc.gov	Contact email	
Uniform claim identifier (if you use one):				
4.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (if known)	Filed on	
5.	Do you know if anyone else has filed a proof of claim for this claim?	<ul><li>No</li><li>✓ Yes. Who made the earlier filing? Cathy Love, Set</li></ul>	e Addendum A	

Official Form 410 Proof of Claim

Do you have any number you use to identify the debtor?	No  Yes. Last 4 digits of the debtor's account or any no	umber you use to identify the debtor:	
How much is the claim?	\$ See summary page . Does this No	amount include interest or other charges?	
	Yes	s. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).	
What is the basis of the claim?		reples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  The redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).	
	Damages for discrimination on the base		
Is all or part of the claim secured?	Claim Attachment (Official Form 410-7)  Motor vehicle Other. Describe:  Basis for perfection: Attach redacted copies of documents, if any	the debtor's principle residence, file a Mortgage Proof of A) with this Proof of Claim.   y, that show evidence of perfection of a security interest (for e, financing statement, or other document that shows the lien	
	Value of property:	\$	
	Amount of the claim that is secured:  Amount of the claim that is unsecured:	\$(The sum of the secured and unsecured amount should match the amount in line 7	
	Amount of the claim that is unsecured:		

10. Is this claim based on a **№** No lease? Yes. Amount necessary to cure any default as of the date of the petition. 11. Is this claim subject to a right of setoff? **☑** No

Official Form 410

■ Variable

Yes. Identify the property:

12. Is all or part of the claim	<b>№</b> No		
entitled to priority under 11 U.S.C. § 507(a)?	_	ck all that apply:	Amount entitled to priority
A claim may be partly priority and partly		estic support obligations (including alimony and child support) under .S.C. § 507(a)(1)(A) or (a)(1)(B).	C.
nonpriority. For example, in some categories, the law limits the amount		\$3,350* of deposits toward purchase, lease, or rental of property rvices for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$
entitled to priority.	days	es, salaries, or commissions (up to \$15,150*) earned within 180 before the bankruptcy petition is filed or the debtor's business ends, never is earlier. 11 U.S.C. § 507(a)(4).	\$
	☐ Taxe	s or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$
	Cont	ributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$
	Othe	r. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$
	* Amounts	are subject to adjustment on 4/01/25 and every 3 years after that for cases begun	on or after the date of adjustment.
13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?	days befo	cate the amount of your claim arising from the value of any goods recore the date of commencement of the above case, in which the goods ary course of such Debtor's business. Attach documentation supporting	have been sold to the Debtor in
Part 3: Sign Below			
The person completing this proof of claim must sign and date it. FRBP 9011(b).  If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.  A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  18 U.S.C. §§ 152, 157, and 3571.	I am the trus I am a guara I understand that the amount of the I have examined I declare under pe	ditor.  ditor's attorney or authorized agent.  stee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.  antor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.  an authorized signature on this <i>Proof of Claim</i> serves as an acknowled e claim, the creditor gave the debtor credit for any payments received to the information in this <i>Proof of Claim</i> and have reasonable belief that the enalty of perjury that the foregoing is true and correct.  2. 09/12/2025  MM / DD / YYYYY	ward the debt.
	/s/Megan K. Signature	•	
	Name	of the person who is completing and signing this claim:  Megan K. OByrne	
	Nume		name
	Title	Trial Attorney	
	Company	EEOC Identify the corporate servicer as the company if the authorized agent is a servicer	<u></u>
	Address		
	Contact phone	Email	



Official Form 410 Proof of Claim

# Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (866) 927-7076 | International (310) 751-2650

	(000) 02: 10:0	(0.0) (0.0)
Debtor:		
25-10368 - Air Pros, LLC		
District:		
Northern District of Georgia, Newnan Division  Creditor:	Use Summerting Dee	autatian
Equal Employment Opportunity Commission	Has Supporting Doc	umentation: ng documentation successfully uploaded
Megan K. OByrne	Related Document S	
950 17th St., Ste. 300	Trelated Boodinent o	tatomont.
	Has Related Claim:	
Denver, CO, 80202	Yes	
United States	Related Claim Filed	
Phone:	Cathy Love, S	ee Addendum A
720-779-3608	Filing Party:	
Phone 2:	Authorized ag	ent
720-297-3872 <b>Fax:</b>		
Email:		
megan.obyrne@eeoc.gov		
Disbursement/Notice Parties:  Charging Party and Aggrieved Individuals		
TBD		
TBD, TBD, TBD		
Phone:		
Phone 2:		
Fax:		
E-mail:		
DISBURSEMENT ADDRESS		
Other Names Used with Debtor:	Amends Claim:	
	No	
	Acquired Claim:	
	No	1
Basis of Claim:	Last 4 Digits:	Uniform Claim Identifier:
Damages for discrimination on the basis of sex and retaliation.	No	
Total Amount of Claim:	Includes Interest or	Charges:
Estimated at over 5.5 million.	No	•
Has Priority Claim:	Priority Under:	
No		
Has Secured Claim:	Nature of Secured A	mount:
No	Value of Property:	
Amount of 503(b)(9):	Annual Interest Rate	:
No	Arrearage Amount:	
Based on Lease:	_	
No Subject to Bight of Satoffi	Basis for Perfection:	
Subject to Right of Setoff: No	Amount Unsecured:	
Submitted By:		
Megan K. OByrne on 12-Sep-2025 12:41:04 p.m. Pacific	Time	
Title:		
Trial Attorney		
Company:		
FEOC		

# Case 25-10356-pmb Doc 283 Filed 04/29/25 Entered 04/29/25 11:08:12 Desc Main Document Page 17 of 21

Your claim can be filed electronically on Verita's website at https://www.veritaglobal.net/AirPros

United States Bankruptcy Court for the Northern District of Georgia, Newnan Division				
Indicate Debtor against which you assert a claim by checking the appropriate box below. (Check only one Debtor per claim form.)				
☐ AFH Air Pros, LLC (Case No. 25-10356)	☐ Air Pros Solutions Holdings, LLC (Case No. 25-10363)	☐ Dallas Plumbing Air Pros, LLC (Case No. 25-10370)		
☐ Air Pros Atlanta LLC (Case No. 25-10357)	☐ Air Pros Solutions, LLC (Case No. 25-10364)	☐ Doug's Service Air Pros, LLC (Case No. 25-10371)		
☐ Air Pros Blue Star, LLC (Case No. 25-10358)	☐ Air Pros Texas LLC (Case No. 25-10365)	☐ Dream Team Air Pros, LLC (Case No. 25-10372)		
☐ Air Pros Boca LLC (Case No. 25-10359)	☐ Air Pros Washington, LLP (Case No. 25-10366)	☐ East Coast Mechanical, LLC (Case No. 25-10373)		
☐ Air Pros Colorado LLC (Case No. 25-10360)	☐ Air Pros West LLC (Case No. 25-10367)	☐ Hansen Air Pros, LLC (Case No. 25-10374)		
☐ Air Pros Dallas L.L.C. (Case No. 25-10361)	☐ Air Pros, LLC (Case No. 25-10368)	☐ Mauzy Air Pros, LLC (Case No. 25-10375)		
☐ Air Pros One Source LLC (Case No. 25-10362)	☐ CM Air Pros, LLC (Case No. 25-10369)			

## **Modified Official Form 410**

## **Proof of Claim**

12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

P	Identify the Clair	n	
1.	Who is the current creditor?	Name of the current creditor (the person or entity to be paid for this clair Other names the creditor used with the debtor	
2.	Has this claim been acquired from someone else?	No Yes. From whom?	
3.	Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Number Street  City State ZIP Code	Name  Number Street  City State ZIP Code
		Country  Contact phone  Contact email  Uniform claim identifier (if you use one):	Country  Contact phone  Contact email
4.	Does this claim amend one already filed?	No Yes. Claim number on court claims registry (if known)	Filed on
5.	Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made the earlier filing?	

# Case 25-10356-pmb Doc 283 Filed 04/29/25 Entered 04/29/25 11:08:12 Desc Main Document Page 18 of 21

P	art 2: Give Information Ab	out the Claim as of the Date the Case Was Filed
6.	Do you have any number you use to identify the debtor?	No  Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:
7.	How much is the claim?	\$ Does this amount include interest or other charges?
		Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8.	What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  Limit disclosing information that is entitled to privacy, such as health care information.
9.	Is all or part of the claim secured?	No   Yes. The claim is secured by a lien on property.   Nature of property:   Real estate: If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim Attachment (Official Form 410-A) with this Proof of Claim.   Motor vehicle   Other. Describe:    Basis for perfection:  Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)   Value of property: \$
		Amount of the claim that is secured: \$  Amount of the claim that is unsecured: \$ (The sum of the secured and unsecured amount should match the amount in line 7.)
		Amount necessary to cure any default as of the date of the petition: \$
		Annual Interest Rate (when case was filed)%  Fixed  Variable
10	Is this claim based on a lease?	No         Yes. Amount necessary to cure any default as of the date of the petition.
11	Is this claim subject to a right of setoff?	□ No □ Yes. Identify the property:

# Case 25-10356-pmb Doc 283 Filed 04/29/25 Entered 04/29/25 11:08:12 Desc Main Document Page 19 of 21

12. Is all or part of the claim entitled to priority under	☐ No			
11 U.S.C. § 507(a)?	☐ Ye	s. Check all that apply:	Amount entitled to priority	
A claim may be partly priority and partly nonpriority. For example,		Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$_	
in some categories, the law limits the amount entitled to priority.		Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$	
entitied to priority.		Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$	
		Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$	
		Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$	
		Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$	
	*	Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases beg	un on or after the date of adjustment.	
13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?				
Part 3: Sign Below				
The person completing this proof of claim must sign and date it. FRBP 9011(b).  If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.  A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  18 U.S.C. §§ 152, 157, and 3571.	I am I am I am I am I am I am I understa the amour I have exa I declare to Executed Signate	mm / DD / YYYYY  MCGAW K. OBGRNC  Tree  Tree  The person who is completing and signing this claim:	oward the debt.  he information is true and correct.	
		City State ZIP C	ode Country	
	Contact pho	ne Email		



# U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION Denver Field Office

950 17<sup>th</sup> Street, Suite 300 Denver, CO 80202

Intake Information Group: (800) 669-4000 Intake Information Group TTY: (800) 669-6820

Denver Direct Dial: (720) 779-3610 FAX (303) 866-1085 Website: www.eeoc.gov

Charge Number: 541-2022-00655

Cathy Love P.O. Box 552 Pointblank, TX 77364 **Charging Party** 

Air Pros Colorado LLC 3740 Interpark Drive Colorado Springs, CO 80907 Respondents

Air Pros One Source LLC 3740 Interpark Drive Colorado Springs, CO 80907

Air Pros Solutions, LLC a/k/a Air Pros USA 150 S. Pine Island Road Plantation, FL 33020

Air Pros, LLC 2801 Evans Street Hollywood, FL 33020

Air Today Holdings L.L.C. c/o Anthony Perera Exuma Capital Partners LLC 1250 South Pine Island Road, Ste. 500 Plantation, FL 33324

Any Hour LLC c/o Shamik Patel, Dave Coghlan, Mike Irby Knox Lane LP 655 Montgomery Street, Ste. 1905 San Francisco, CA 94111

Paychex PEO IV, LLC 911 Panorama Trail South Rochester, NY 14625

#### **LETTER OF DETERMINATION**

On behalf of the U.S. Equal Employment Opportunity Commission ("the Commission"), I issue the following determination on the merits of the subject charge. Respondents Air Pros, LLC, Air

Letter of Determination EEOC No. 541-2022-00655 Love v. Air Pros, LLC

Pros One Source LLC, Air Pros Colorado LLC, Air Pros Solutions, LLC, Air Today Holdings L.L.C., Any Hour LLC, and Paychex PEO IV, LLC are employers within the meaning of Title VII of the Civil Rights Act of 1964, as amended ("Title VII"). Timeliness and all other requirements for coverage have been met.

Charging Party alleges she and other female employees were discriminated against because of their sex and in retaliation for reporting harassment in violation of Title VII. Charging Party alleges male managers and non-managers subjected female employees to harassment that was severe or pervasive enough to create a hostile work environment based on sex. Charging Party also alleges Respondents discriminated against female employees with respect to hiring, promotions, work assignments, pay, training, discipline, termination, and other terms and conditions of employment.

Respondents deny the allegations.

Based on the evidence obtained during the investigation of this charge, I find there is reasonable cause to believe Respondents violated Title VII by subjecting Charging Party and other female and male employees to sexual harassment, a hostile work environment based on sex, and discharge or constructive discharge because of sex. I also find reasonable cause to believe Respondents violated Title VII by discriminating against female employees with respect to their compensation and by discriminating against Charging Party and other female employees with respect to their terms, conditions, or privileges of employment, including failing to promote qualified female employees, failing to provide equal training opportunities, and assigning female employees less desirable work than male employees. Finally, I find there is reasonable cause to believe Respondents violated Title VII by retaliating against Charging Party and other employees for engaging in protected activity.

On June 18, 2025, the Commission issued a subpoena to Respondent Air Pros, LLC after it failed to provide complete information in response to the Commission's Requests for Information. After Respondent Air Pros, LLC failed to fully respond to the subpoena and did not file a petition to revoke or modify the subpoena, the Commission informed Respondent Air Pros, LLC that it risked an adverse finding should it not provide all the requested information by July 15, 2025. Respondent Air Pros, LLC again failed to provide all the requested information. Inasmuch as Respondents have been afforded an opportunity to provide information requested by the Commission and have failed to do so, the Commission, at this time, determines that said silence constitutes an admission to the allegations made by Charging Party. In addition to the findings above, the Commission exercises its discretion to draw an adverse inference with respect to Charging Party's allegations based on Respondents' failure to respond to the Commission's subpoena.

Respondents are reminded that federal law prohibits retaliation against persons who have exercised their right to inquire or complain about matters they believe may violate the law. Discrimination against persons who have cooperated in the Commission's investigations is also prohibited. These protections apply regardless of the Commission's determination on the merits of the charge.

The determination is final. Having determined that there is reason to believe that a violation occurred, the Commission now invites the parties to join with it in a collective effort toward a just resolution of this matter. If Respondents decline to enter into settlement discussions, or when, for any other reason, a settlement acceptable to the Director is not obtained, the Director will inform

Letter of Determination EEOC No. 541-2022-00655 Love v. Air Pros, LLC

the parties in writing and advise them of the court enforcement alternatives available to the Charging Party, aggrieved persons and the Commission.

Investigator Joseph Cosgrove will be contacting you shortly regarding conciliation discussions. You can reach Investigator Cosgrove at (720) 779-3615 or joseph.cosgrove@eeoc.gov.

Sh

Date

Sh

Ha

Sh

Cc:

Diane King King Employment Law 1670 York Street Denver, CO 80206 king@kingemploymentlaw.com

Michael J. Breaker Jackson Lewis P.C. 950 17th Street, Ste. 2600 Denver, CO 80202 michael.breaker@jacksonlewis.com

David B. Kurzweil
Ari Newman
Leo Muchnik
Greenberg Traurig, LLP
3333 Piedmont Road, NE, Ste. 2500
Atlanta, Georgia 30305
kurzweild@gtlaw.com
newmanar@gtlaw.com
muchnikl@gtlaw.com

Jordi Guso Michel Debolt Berger Singerman LLP 1450 Brickell Avenue, Ste. 1900 Miami, FL 33131 jguso@bergersingerman.com mdebolt@bergersingerman.com On Behalf of the Commission:

Sherrie

Hayashi

Digitally signed by Sherrie Hayashi
Date: 2025.08.19
13:19:44-06'00'

Sherrie M. Hayashi Field Office

Letter of Determination EEOC No. 541-2022-00655 Love v. Air Pros, LLC

Elijah J. Hammans W. Timothy Miller Taft Stettinius & Hollister LLP One Indiana Square, Ste. 3500 Indianapolis, IN 46204 ehammans@taftlaw.com miller@taftlaw.com

Andrew Hede Accordion 1201 W Peachtree Street NW, Ste. 975 Atlanta, GA 30309 ahede@accordion.com

Paychex Claims Department 82 Hopmeadow Street Simsbury, CT 06070 eplclaims@paychex.com

Chubb Insurance Legal Department 202 Halls Mill Road Whitehouse Station, NJ 08889

### IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA NEWNAN DIVISION

In re:	Chapter 11
AFH AIR PROS, LLC, et al.	Case No. 25-10356 (PMB)
Debtors.	

## 

The EEOC's claims against debtors Air Pros Colorado LLC, Air Pros One Source LLC, Air Pros, LLC and Air Pros Solutions, LLC are based on discrimination on the basis of sex and retaliation in violation of Title VII of the Civil Acts of 1964 against Charging Party Cathy Love and a class of Aggrieved Individuals.